

Before the  
COPYRIGHT ROYALTY JUDGES  
Washington, D.C.

In the Matter of	)	
	)	
Distribution of	)	CONSOLIDATED DOCKET NO.
<u>Cable Royalty Funds</u>	)	14-CRB-0010-CD/SD
	)	(2010-2013)
In the Matter of	)	
	)	
Distribution of	)	
<u>Satellite Royalty Funds</u>	)	

**RAUL GALAZ DECLARATION IN SUPPORT OF  
MULTIGROUP CLAIMANTS’ OPPOSITION TO SETTLING  
DEVOTIONAL CLAIMANTS’ MOTION TO DE-DESIGNATE  
RESTRICTED MATERIALS.**

I, RAUL GALAZ, declare and state as follows:

1. I submit this declaration in support of Multigroup Claimants’

*Opposition to Settling Devotional Claimants’ Motion to De-Designate Restricted  
Materials.* The following facts are within my personal knowledge, and if called  
upon I could and would testify competently thereto.

2.

REDACTED

REDACTED

3.

REDACTED

4. Multigroup Claimants is an assumed business name of Worldwide Subsidy Group, LLC. WSG has been in existence for 22 years, since 1998. In the

## Public

course of that existence, not one WSG-represented claimant has ever filed suit against WSG. In fact, despite having to file suit against four former clients, none ever filed a counterclaim against WSG. To my knowledge, only two parties in 22 years have ever expressed discontent with WSG, and the judges are aware of both instances.

5. The first instance occurred in 2005, when counsel for two WSG-represented claimants wrote an email to WSG and multiple SDC representatives, prompted by misinformation provided by the current SDC counsel. Specifically, according to Mr. David Joe (counsel to Kenneth Copeland Ministries and Benny Hinn Ministries), Barry Gottfried of the law firm Pillsbury, Winthrop, et al. (or its predecessor), secretly contacted Mr. Joe, revealed the contents of a confidential settlement agreement with WSG, then led Mr. Joe to believe that WSG had failed to account for the funds due to one of his clients. That information was incorrect, was quickly revealed as such, and Mr. Joe's clients have remained clients of WSG since 1998. At such time, WSG considered filing an action for defamation and breach of contract against Mr. Gottfried, his law firm, and his represented client Christian Broadcasting Network, but ultimately resolved to ignore the actionable conduct.

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6. The second instance occurred in connection with claims asserted for non-commercial broadcasts of programming owned by Bob Ross, Inc. Under the mutual misimpression that the last of several agreements between WSG and Bob Ross, Inc. granted WSG continuing authority to seek retransmission royalties on its behalf, WSG made claim, and accounted to Bob Ross, Inc. over the course of several years. After discovering the mutual error, Bob Ross, Inc. (who was represented by counsel to an SDC member) demanded that WSG return to Bob Ross, Inc. the commission amounts that had been retained by WSG. WSG informed Bob Ross, Inc. that it would not do so unless all of the collected royalties were returned to PBS, the payor. That is, if Bob Ross, Inc. theorized that WSG did not have the requisite authority to make the claims from which royalties were generated, then Bob Ross, Inc. was similarly obligated to forfeit any collected monies. Bob Ross, Inc. refused.

7. WSG has had six prior owners or co-owners that are no longer owners, and not once in 22 years has the identity of WSG's owners been raised as an issue – until now, by the SDC, whom has no contractual relationship with WSG.

8. WSG has not identified any individual by an “officer” title for approximately ten years, and possibly longer.

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 18<sup>th</sup> day of March, 2020.

\_\_\_\_\_/s/\_\_\_\_\_  
Raul Galaz

# Proof of Delivery

I hereby certify that on Wednesday, March 18, 2020, I provided a true and correct copy of the RAUL GALAZ DECLARATION IN SUPPORT OF MULTIGROUP CLAIMANTS' OPPOSITION TO SETTLING DEVOTIONAL CLAIMANTS' MOTION TO DE-DESIGNATE RESTRICTED MATERIALS to the following:

Joint Sports Claimants (JSC), represented by Iain McPhie, served via Electronic Service at iain.mcphie@squirepb.com

MPA-Represented Program Suppliers (MPA), represented by Alesha M Dominique, served via Electronic Service at amd@msk.com

Canadian Claimants Group, represented by Victor J Cosentino, served via Electronic Service at victor.cosentino@larsongaston.com

Settling Devotional Claimants (SDC), represented by Arnold P Lutzker, served via Electronic Service at arnie@lutzker.com

Public Television Claimants (PTC), represented by Dustin Cho, served via Electronic Service at dcho@cov.com

National Association of Broadcasters (NAB) aka CTV, represented by David J Ervin, served via Electronic Service at dervin@crowell.com

Signed: /s/ Brian D Boydston